## **LOCAL BANKRUPTCY FORM 9013-3**

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	<b>:</b>
Jason M. Leckrone Bethany J. Leckrone Debtor(s)	: CHAPTER <u>13</u> : CASE NO.: <u>18-01381</u> :
U.S. Bank National Association Plaintiff(s)/Movant(s) vs	: ADVERSARY NOap : (if applicable) : Nature of Proceeding: Motion for Relief
Jason M. Leckrone Bethany J. Leckrone	: from the Automatic Stay : Document #: 23
Charles J. DeHart III  Defendants(s)/Respondent(s)	:

## REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with all concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance.

Debtor has proposed a resolution to the Motion for Relief and Movant has the proposal under consideration. Additional time is needed to formalize the stipulation for circulation.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 8/24/18	/s/ Karina Velter
	Attorney for <u>U.S. Bank National Association</u>
	Name: <u>Karina Velter</u>
	Phone Number: 614-220-5611